

INTERPRETIVE GUIDANCE DOCUMENT (IGD)

Environmental, Safety and Occupational Health Management System
 Defense National Stockpile Center

Version: July 2004

**TABLE 1-1
 SUMMARY OF MINOR NONCONFORMANCES
 AND OBSERVATIONS**

INSTALLATION: DNSC

AUDIT DATE: JUL 2004

NUMBER		ISO 14001 REFERENCE		LEAD	RESOLUTION OF NONCONFORMANCE	STATUS
	NONCONFORMANCE ISSUE(S)	Section	Title			
1	Based on the results of interviews with DNSC-HQ personnel, the DNSC Environmental Policy had not been effectively communicated to all employees. Two individuals at DNSC-HQ indicated that they were not familiar with the contents of the Environmental Policy Statement.	4.2(e)	Environmental Policy	HQ: Frank Taylor	DNSC-DI to provide individual coaching sessions with the two individuals and document session(s).	
2	The DNSC-Warren and DSNC-Point Pleasant Universal Waste SOPs did not include all of the legal requirements for the management of Universal Waste as required by IGD 1003, Section 302. For example, the DNSC-Warren Universal Waste SOP did not include dating requirements (OEPA Rule 3745-273-14); and the DNSC-Point Pleasant Universal Waste SOP did not include dating and container storage requirements (Section 13 of WV State Rule 33 CSR 20).	4.3.2	Legal and Other Requirements	Warren: Jack Pittano Pt. Pleasant: Cam Delhoste	DNSC will correct the situation and provide documentation of current storage practices.	
3	While IGD 1005, Tables 5a and 5b list the DNSC Objects and Targets, some of the Objectives and Targets (e.g., "Mitigation of Dust Generation" from Out-loading Commodity Piles to Transits and Trucks) were too general to be tracked throughout the projected period of implementation. The DNSC-HQ tended to track this type of activity on a commodity-specific basis (e.g., low-grade manganese, lead ingots, etc.)	4.3.3	Objectives and Targets	HQ: Steve Surface Lori Davidson	Tables 5a and 5b will be revised and included on the website.	

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4	The evolving HQ-DLA Safety Action Plan (and accompanying Safety Metrics) represent an additional consideration that will need to be integrated into IGD 1005 since DNSC has adopted DLA policies and regulations as part of its “other requirements” per IGD 1003.	4.3.3	Objectives and Targets	HQ: Steve Surface Lori Davidson	When plan is fully implemented DNSC will include it in our ESOHMS	Observation Only
5	While IGD 1005, Table 5a lists the DNSC Objectives/Targets, the time-frame for one of the targets (related to “Fugitive Dust” from the Lead Storage) had not been specified. The time-frame (i.e., date of completion) for targets related to “Reportable Spills” from Material Handling Operations; and “Disposal of Fluorescent Light Bulbs” at various DNSC facilities indicated that these targets had been achieved. However, the achievement of these targets was still an on-going effort.	4.3.4(b)	Environmental Management Programme(s)	HQ: Steve Surface Lori Davidson	Tables 5a and 5b will be revised and included on the website.	
6	The DNSC-Somerville Hazardous Waste (HW) Management Plan required the appointment (by the Depot Manager) of a DNSC-Somerville HW Coordinator. No DNSC-Somerville HW Coordinator had ever been appointed.	4.4.1	Structure and Responsibility	Somerville: James Farley Jason Boynton	Distribution Facilities Manager will name a HW coordinator and provide documentation.	
7	The DNSC-Warren training matrix did not indicate what specific training personnel were required to receive. The matrix was a generic one and included all types of training for each individual whether or not the training was actually required for the job function.	4.4.2	Training, Awareness, and Competence	HQ: Lori Davidson	The name of the courses will be changed and the updated spreadsheets will be provided for review.	

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8	The DNSC-Somerville, DNSC-Warren, and DNSC-Point Pleasant training matrixes did not indicate the frequency of required training and did not distinguish between initial one-time training (e.g., 40-hr HAZWOPER) and annual refresher training (e.g., 8-hr HAZWOPER refresher).	4.4.2	Training, Awareness, and Competence	HQ: Lori Davidson	The updated spreadsheets will be provided for review.	Observation Only
9	The DNSC-Warren Storm Water Pollution Prevention Plan indicated that training of the Storm Water Pollution Prevention Team would be given annually on 15 Jan. While the annual training was being conducted (and documented), the training was not being given on 15 Jan.	4.4.2	Training, Awareness, and Competence	Warren: Jack Pittano	A new stormwater plan is being implemented for this installation. Future training will be done in compliance with this document and a specific date won't be identified.	Observation Only
10	Although the new DNSC-Point Pleasant Emergency Response Plan (July 2004) had been finalized, this document had not been posted on the DNSC ESOHMS website by DNSC-HQ. Per IDG 1010, Section 2.1(d), this plan is a controlled document. Once the plan is posted on the website, hard copies of the plan being maintained at DNSC-Point Pleasant must be stamped in accordance with IGD 1010, Section 3.1.	4.4.5	Document Control	Pt. Pleasant: Cam Delhoste	A new Emergency Plan has been completed for the depot. Due to security and privacy requirements, this document will not be available on the website. Documentation of the plan appropriately stamped will be provided.	

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11	The hard copies of the DNSC FY 04 Annual Safety and Health Plan being maintained at DNSC-Warren and DNSC-Point Pleasant were not stamped in accordance with the DNSC ESOH Document Control Procedure (IGD 1010, Section 3.1). The DSNS-Somerville Emergency Response Plan (being maintained at the Maintenance Shop) also had not been stamped in accordance with the DNSC ESOH Document Control Procedure (IGD 1010, Section 3.1).	4.4.5	Document Control	Warren: Jack Pittano Pt. Pleasant: Cam Delhoste Somerville: Jason Boynton	Warren & Pt. Pleasant: The document will be appropriately stamped and documentation of the action will be provided. Somerville: A new Emergency Plan has been completed for the depot. It is currently in draft form. Once finalized they will be reviewed in compliance with the report. Due to security and privacy requirements, this document will not be available on the website.	
12	Obsolete copies of the following documents were not stamped according to IGD 1010, Section 2.3(d): DNSC-Somerville Storm Water Pollution Prevention Plan (1995 version); DNSC-Point Pleasant Emergency Protection Plan (2003 version); and DNSC-Somerville Safety & Health Plan, Addendum: Mercury.	4.4.5	Document Control	Somerville : Jason Boynton Pt. Pleasant : Cam Delhoste	The documents will be appropriately stamped and documentation of the action will be provided.	

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13	Several DNSC-Somerville plans were stamped according to the DNSC ESOH Document Control Procedure (IGD 1010, Section 3.1) indicating that these plans were controlled documents available on the DNSC ESOHMS website. However, these plans were not posted on the website. These plans included: DNSC HW Mgt Plan (CY 2002); DLA Environmental HM/HW Training Plan (Jan 98); and the DNSC-Somerville Safety & Health Plan, Addendum: Mercury.	4.4.5	Document Control	Somerville : Jason Boynton	The documents will be appropriately marked and documentation of the action will be provided.	
14	The DNSC-Point Pleasant SOP for Fluorescent Light Bulbs lacked a revision number and date per IGD 1010, Section 2.3(e). This SOP was a controlled document since “depot specific SOPs” were referenced in Table 5A for as the operation control for the Objective/Target associated with the “disposal of fluorescent bulbs”. This DNSC Objective/Target related to one of the DNSC significant aspects.	4.4.5	Document Control	HQ: Steve Surface Lori Davidson	DNSC has created new targets and objectives based on our impacts and aspects. This will no longer be measured or monitored in compliance with our ESOH management system.	
15	The DNSC HW Mgt Plan (CY 2002) was stamped “Obsolete – Retained for Historical Use Only” per IGD 1010, Section 2.3(d). However, this plan was still in use at DNSC-Somerville and was not an obsolete document.	4.4.5	Document Control	Somerville : Jason Boynton	The document is obsolete. Appropriate current documents will be provided.	

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16	The Environmental Inspection Plan for Mercury in Storage (5 Nov 2002) was an uncontrolled document that had replaced an controlled document (i.e., DNSC-Somerville Safety & Health Plan, Addendum: Mercury	4.4.5	Document Control	HQ : Lori Davidson	This information will be added as an addendum to the web site, it will be a sampling plan and presented in conjunction with the occupational health and safety plan for mercury currently located in IGD 1005.	Observation Only COMPLETE
17	There was an inconsistency between IGD 1010 and IGD 1012. The IGD 1012, Sections 3.0 & 3.1 (Emergency Response Plans) stated “these are examples of typical documents that are not necessarily controlled by the ESOHMS Manual.” This was inconsistent with IGD 1010, Sections 2.1(d) & 2.3 that indicated that Emergency Response Plans were controlled documents.	4.4.5	Document Control	HQ: Lori Davidson	Verbiage within IGD 1010 and 1012 will be changed and submitted to the website to reflect this audit finding. Emergency Plans will not be available on the website due to security and privacy requirements.	Observation Only COMPLETE
18	Spent fluorescent bulbs at DNSC-Point Pleasant were being stored beyond the one-year period specified in the DNSC-Point Pleasant SOP for Fluorescent Light Bulbs (IGD 1011, Section 2.1).	4.4.6	Operational Control	Pt. Pleasant : Cam Delhoste	The bulbs will be disposed of and documentation will be provided.	

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19	There was no tracking mechanism at DNSC-Somerville to indicate how used fluorescent light bulbs were being disposed. One of the DNSC Objectives/Targets related to eliminating the disposal of fluorescent light bulbs in the dumpsters.	4.4.6	Operational Control	HQ: Steve Surface Lori Davidson	DNSC has created new targets and objectives based on our impacts and aspects. This will no longer be measured or monitored in compliance with our ESOH management system.	
20	Spill reports were not being provided to the DNSC-Somerville and DNSC-Warren Depot Managers for forwarding to DNSC-HQ as required by IGD 1012, Section 2.1. This procedural spill reporting requirement was also contained in the DNSC Spill Prevention Control and Countermeasures Supplemental IDG Procedure (Mar 2004). One of the DNSC Objectives/Targets related to eliminating reportable spills.	4.4.7	Emergency Preparedness and Response	HQ: Steve Surface Lori Davidson	DNSC Spill Prevention Control and Countermeasures included within IGD 1012 will be changed on the website to reflect audit findings.	COMPLETE
21	The DNSC-Somerville Emergency Response Plan had not been reviewed in accordance with IGD 1012, Section 2.2 and the Plan objectives. The plan indicated that semi-annual review was required.	4.4.7	Emergency Preparedness and Response	Somerville: Jason Boynton	A new Emergency Plan has been completed for the depot. It is currently in draft form. Once finalized they will be reviewed in compliance with the report.	

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22	There was a discrepancy (relating to the need to document reported spills) between the DNSC Installation Spill Contingency Plan (ISCP) (FY 00-03) and the DNSC Spill Prevention Control and Countermeasures Supplemental IGD Procedure (Mar 2004). The ISCP required documentation of these spills whereas the IGD supplemental procedure only required the reporting of these spills.	4.4.7	Emergency Preparedness and Response	HQ: Steve Surface Lori Davidson	DNSC Spill Prevention Control and Countermeasures included within IGD 1012 will be changed on the website to reflect audit findings.	Observation Only COMPLETE
23	There was no calibration schedule for equipment requiring calibration at DNSC-Somerville as required by IGD 1013, Section 3.2.	4.5.1	Monitoring and Measurement	Somerville: Jason Boynton	A calibration schedule will be developed for this site and documentation provided.	
24	The monitoring operational controls (i.e., visual inspections) for the DNSC-Point Pleasant Groundwater Protection Plan were being performed semi-annually rather than quarterly (as specified in the plan) [IGD 1013, Section 2.1(b)].	4.5.1	Monitoring and Measurement	Pt. Pleasant: Cam Delhoste	A new stormwater plan is being implemented for this installation. It will include requirements from the state mandated ground water protection plan. Once completed sampling will be completed in compliance with new all inclusive documents.	

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25	The DNSC-HQ Audit Tracking Systems for both conformance and compliance audits (as posted on the DNSC ESOHMS website) did not reflect the corrective actions from recent DNSC depot conformance and compliance audits per IGD 1014, Section 2.2(b).	4.5.2	Nonconformance and Corrective and Preventive Action	HQ: Frank Taylor	New documents are being developed and will be included on the website.	
26	The following depot-specific records were not available in the respective depot files: DNSC-Somerville [FY 03 internal environmental compliance audit and the monthly inspection records for the mercury storage area (31 Oct 2003 – 8 Mar 2004)]; DNSC-Warren (Notice of Termination of the DNSC-Warren Storm Water Permit); and DNSC-Point Pleasant (Corrective Action Report for the March 2003 Environmental Compliance Assessment System Audit). The above were required records per IGD 1015, Sections 2.1(b), 2.1(c), and 2.1(d), respectively. Under IGD 1016, Section 2.7 (Records), the “complete audit file” must include responses to the audit report.	4.5.3	Records	Somerville: Jason Boynton Warren: Steve Surface Pt. Pleasant (HQ): Lori Davidson	Somerville: Reports are available and will be provided for review. Warren: Every effort will be made to obtain a copy of this record. ESOHMS document control procedures will be changed to protect documents in the future. Pt. Pleasant: Verbiage within IGD 1016 2.7 will be changed on the website to reflect these audit findings.	Pt. Pleasant (HQ): COMPLETE

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